September 20, 1995 5 9 7 99 SEP 24 A 9:42

To: Food and Drug Administration Attn: Dockets Management Branch (HFA-305) Fax # (301) 594-1831

From James R. Kiser Jr. and Laura Phipps (Please confirm receipt of fax at (850) 562-3409

Re: Dockets number 98N-1230, 96P-0418 and 97P-0197

The FDA was petitioned in April 1998 to ban forced molting of hens to manipulate egg production. This petition should be granted without further delay.

The FDA should act immediately to prohibit the practice of forced molting because it has been scientifically shown to promote disease by destroying the starving hens' immune systems.

The US Department of Agriculture's Food, Safety and Inspection Service has stated: "FSIS recognizes that public health concerns are raised by highly stressful forced molting practices. For example, extended starvation and water deprivation practices lead to increased shedding of Salmonella enteritis by laying hens subjected to these practices."

Forced molting of laying hens is a primary cause of infectious diseases in hens, eggs, and consumers of eggs. It is not only cruel, it is detrimental to the health of consumers, which FDA is mandated to protect.

It is not enough to place bacteria labels on egg cartons and regulate egg refrigeration temperatures, because these practices cannot overcome the negative effects of forced molting of laying hens.

It is within the jurisdiction and responsibility of FDA to ban farm practices such as forced molting of laying hens that injure human health.

Failure to ban forced molting of laying hens constitutes criminal negligence on the part of FDA, and can only be seen as capitulation to the greed of the poultry industry.

Signed:

James R. Kiser, Jr.

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Date: 09/21/99 Time: 12:14:00

Pages: 2

To: Dockets Management Branch HFA-305

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## HEALTH AND HUMAN SERVICES FOOD AND DRUG ADMINISTRATION

## **CROSS REFERENCE SHEET**

Docket Number/Item Code: 98N-1230/C715

See Docket Number/Item Code: 97P-0197/C716

96P-0418/C715